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February 15, 2021

Via ECF

The Honorable District Judge Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **Hernandez, et al. v. San Marino at Soho Incorporated, et al.**
19-CV-7976 (AJN)

Dear Judge Nathan:

We represent the Plaintiffs in the above-referenced matter and we submit this letter motion to respectfully request a two-week extension of time to file the parties' jury instructions, joint pre-trial order and pretrial memorandum due to the Court on February 12, 2021. Defendants consent to this request.

Shortly after the submission of this request, the parties are separately filing their agreed-upon voir dire questions and their proposed verdict sheet (noting where the parties' remaining disputes lie). Despite nearly a dozen phone calls and many hours over the last two weeks regarding the jury instructions and joint pre-trial order, the parties still have numerous disagreements regarding these two documents that they believe should be resolved before submitting to the Court. As the parties are still engaged in discussion regarding the contents of these two documents, we respectfully ask the Court for additional time to file in an effort to further narrow these disputes. If this request is granted, the parties can submit their jury instructions and joint pre-trial order to the Court on or before February 26, 2021.

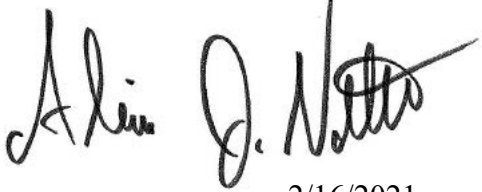
This is the second request for an extension of time to file these pre-trial documents. The first request was granted by the Court on January 27, 2021. This request will not affect any other scheduled dates or deadlines. Please note that our office attempted to file this request on Friday, February 12, 2021, however, the ECF website was down at the time and not allowing for filings.

We thank Your Honor for her consideration and remain available to provide any additional information.

The date for pretrial submissions is extended to February 26, 2021. The final pretrial conference scheduled for February 24, 2021, is adjourned to March 3, 2021, at 11:00 a.m. SO ORDERED.

Respectfully submitted,

/s/
Roman Avshalumov, Esq.



SO ORDERED. 2/16/2021
ALISON J. NATHAN, U.S.D.J.